

Rick D. Roskelley, Esq., Bar # 3192
Rachel R. Silverstein, Esq., Bar #11057
LITTLER MENDELSON
3960 Howard Hughes Parkway, Suite 300
Las Vegas, NV 89169-5937
Telephone: 702.862.8800
Fax No.: 702.862.8811
email: rroskelley@littler.com
email: rsilverstein@littler.com
Attorneys for Consolidated Defendants

Michael A. Urban, Nevada State Bar No. 3875
Nathan R. Ring, Nevada State Bar No. 12078
THE URBAN LAW FIRM
4270 S. Decatur Blvd., Suite A-9
Las Vegas, NV 89103
T: (702) 968-8087
F: (702) 968-8088
email: murban@theurbanlawfirm.com
email: nring@theurbanlawfirm.com
Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TRUSTEES OF THE NEVADA RESORT
ASSOCIATION—INTERNATIONAL
ALLIANCE OF THEATRICAL STAGE
EMPLOYEES AND MOVING PICTURE
MACHINE OPERATORS OF THE UNITED
STATES AND CANADA, LOCAL 720,
PENSION TRUST; *et al.*,

Plaintiffs,

vs.

HARRAH'S LAS VEGAS, LLC f/k/a
HARRAH'S LAS VEGAS, INC. d/b/a
HARRAH'S LAS VEGAS, *et al.*,

Defendants.

CASE NO. 2:13-cv-00040-APG-PAL

Consolidated with Case Nos.:

2:13-cv-00043;
2:13-cv-00042;
2:13-cv-00046; and
2:13-cv-00047

**JOINT STATUS REPORT RE CAESARS
BANKRUPTCY PROCEEDINGS AND
ORDER**

Plaintiffs, Trustees of the Nevada Resort Association—International Alliance of
Theatrical Stage Employees and Moving Picture Machine Operators of the United States and

1 Canada, Local 720, Pension Trust; Trustees of the Nevada Resort Association—International
 2 Alliance of Theatrical Stage Employees and Moving Picture Machine Operators of the United
 3 States and Canada, Local 720, Wage Disability Trust; and Trustees of the Nevada Resort
 4 Association—International Alliance of Theatrical Stage Employees and Moving Picture Machine
 5 Operators of the United States and Canada, Local 720, Apprentice and Journeyman Training and
 6 Education Trust (collectively, “Plaintiffs” or “Trusts”), by and through their counsel of record,
 7 The Urban Law Firm, and Defendants Harrah’s Las Vegas, LLC; Flamingo Las Vegas Operating
 8 Company, LLC; Desert Palace, Inc.; Paris Las Vegas Operating Company, LLC; and Parball
 9 Corporation (collectively “Defendants”) by and through their counsel of record, Littler
 10 Mendelson, file this Joint Status Report in response to the Court’s Order directing the same
 11 (Doc. No. 70):

12 1. The Parties agree that this matter shall be stayed with respect to Desert Palace,
 13 Inc., until further Order of this Court or until the automatic stay is lifted by the Bankruptcy
 14 Court.

15 2. The Parties further agree that Parball Corporation is a debtor entity included in the
 16 Caesars Entertainment Operating Company (“CEOC”) Bankruptcy. Accordingly, this matter
 17 should be stayed with respect to Parball Corporation until further Order of this Court or until the
 18 automatic stay is lifted by the Bankruptcy Court. The Parties also agree that Plaintiffs will submit
 19 (and Defendants will not oppose) a Motion to Amend their Complaint to add Parball NewCo,
 20 LLC as a defendant. Plaintiffs will submit this request within fourteen (14) days of the entry of
 21 this Order.

22 3. Thus, the Parties agree that this matter should proceed with regard to Harrah’s Las
 23 Vegas, LLC, Flamingo Operating Company, LLC, Paris Las Vegas Operating Company, and (if
 24 approved by the Court) Parball NewCo, LLC.

25 4. Additionally, prior to the CEOC Bankruptcy, Plaintiffs filed a Motion for
 26 Summary Judgment on November 20, 2014 (Doc. # 60), and Defendants opposed it (Doc. # 63)
 27 and also moved to strike the Declaration of Glenn Goodnough (Doc. # 64). Through those
 28 pleadings, and through discussions among counsel since that time, it has become apparent to

both parties that additional discovery is warranted in this case. As a result, the Parties stipulate that docket numbers 60, 63 and 64 be withdrawn without prejudice. The Parties will be submitting a more detailed and specific Joint Motion to Re-Open Discovery contemporaneously herewith. Said Joint Motion will also include future dates for re-submitting any dispositive motions, if they are necessary after additional discovery is completed.

Dated: July 8, 2015

Dated: July 8, 2015

/s/ Sean W. McDonald, Esq.
 Michael A. Urban, Esq.
 Nathan R. Ring, Esq.
 Sean W. McDonald, Esq.
 THE URBAN LAW FIRM
Attorneys for Plaintiffs

/s/ Rick D. Roskelley, Esq.
 Rick D. Roskelley, Esq.
 Rachel R. Silverstein, Esq.
 LITTLER MENDELSON, P.C.
Attorneys for Consolidated Defendants

ORDER

This matter is hereby stayed as to Parball Corporation until further Order of this Court.

Plaintiffs shall have until fourteen days from the date of this Order to submit their Motion to Amend their Complaint to include Parball NewCo, LLC.

Plaintiffs' Motion for Summary Judgment, Defendants' Response to Plaintiffs' Motion for Summary Judgment and Defendants' Counter-Motion to Strike the Declaration of Glenn Goodnough (Doc. Nos. 60, 63 and 64, respectively) are hereby withdrawn without prejudice.

IT IS SO ORDERED.


 UNITED STATES DISTRICT JUDGE

Dated: July 8, 2015

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